

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JANE DOE, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

MICROSOFT CORPORATION, a
Washington Corporation; QUALTRICS
INTERNATIONAL INC., a Delaware
Corporation; and QUALTRICS LLC, a
Delaware Limited Liability Company,

Defendants.

Case No.: 2:23-cv-0718-RSM

**JOINT STIPULATED MOTION AND
ORDER REGARDING PLAINTIFF'S
WORKPLACE COMPUTER**

As set forth herein, Plaintiff Jane Doe ("Plaintiff"), Defendant Microsoft Corporation ("Microsoft"), and Defendants Qualtrics International Inc. and Qualtrics, LLC (together, "Qualtrics"), hereby stipulate as follows:

WHEREAS, Plaintiff served discovery responses on Microsoft on August 14, 2024 and Qualtrics on November 11, 2024 disclosing to Microsoft and Qualtrics that, in addition to Plaintiff's personal cell phone and Chromebook, Plaintiff occasionally used a "computer at work" ("Workplace Computer") to access the Kaiser website.

WHEREAS, thereafter, Microsoft and Qualtrics served discovery requests on Plaintiff seeking the production and/or inspection of any Workplace Computer used by Plaintiff to access the Kaiser website.

WHEREAS, Plaintiff served objections to the requests for production and/or inspection of any Workplace Computer, including that any Workplace Computer is outside Plaintiff's possession, custody, and/or control, as it is owned, managed, or controlled by Plaintiff's employer, and discovery regarding any Workplace Computer would be unduly burdensome, costly, and unnecessarily disruptive and harassing, as it would necessitate the involvement of Plaintiff's employer, a non-party, to this litigation.

WHEREAS, following meet and confer communications, the parties reached a compromise to enter into a stipulation that Microsoft and Qualtrics will agree to not pursue information stored on any Workplace Computer if Plaintiff agrees she will not rely on any information or activity on any Workplace Computer in this litigation.

THEREFORE, IT IS STIPULATED AND AGREED between the undersigned parties, by and through their respective counsel that:

- a. Plaintiff agrees that she will not rely on any information from, or activity conducted on, any Workplace Computer;
- b. Plaintiff agrees to abandon and withdraw any and all asserted claims to the extent the claims are based on information on or activity conducted on any Workplace Computer;
- c. In exchange for Plaintiff's agreement on points (a) and (b) above, Microsoft and Qualtrics agree to not require Plaintiff to produce any Workplace Computer, or any documents or data associated with it.

IT IS SO STIPULATED.

I certify that this Stipulated Motion contains 318 words, in compliance with the Local Civil Rules.

Dated May 8, 2025

Respectfully submitted,

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and Qualtrics, LLC*

ORDER

IT IS SO ORDERED.

Dated this 9th day of May, 2025.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE